

THE HONORABLE DAVID W. CHRISTEL

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

VALERIE REVELL, an individual,  
  
Plaintiff,

v.

VILLAGEPLAN CARE OPTIONS, LLC, a  
Washington Limited Liability Company,  
  
Defendant.

No. 3:21-cv-05548-RAJ-DWC

STIPULATION AND RULE 502(d) ORDER

**I. STIPULATION**

The parties stipulate and agree that the production of privileged or work-product protected documents, electronically stored information (“ESI”) or other information, whether inadvertent or otherwise, should not constitute a waiver of the privilege or protection from discovery in this case or in any other proceeding. The Court’s Order should be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d). Any party receiving evidence that is potentially privileged should promptly return such evidence to the producing party and, if disputed, returned evidence may be the subject of discovery conference and motion practice.

The Court's Order should not serve to limit a party's right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness, and/or segregation of privileged and/or protected information before production.

DATED this 15th day of February, 2022.

DATED this 15th day of February, 2022.

JACKSON LEWIS P.C.

HKM EMPLOYMENT ATTORNEYS LLP

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Counsel for Plaintiff

II. ORDER

PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

Dated this 16th day of February, 2022.



David W. Christel  
United States Magistrate Judge

Presented by:

DATED 15th day of February, 2022.

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